

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	4:22 CR 3077
	)	
vs.	)	
	)	
NEIL SURESH CHANDRAN,	)	
	)	
Defendant	)	
	)	

**GOVERNMENT’S FIRST BILL OF PARTICULARS**

The United States, through undersigned counsel, respectfully shows as follows:

In the forfeiture notice contained within the Indictment referenced above, the Government gave notice of its intent to forfeit, among many other assets, item “jj.” described as “All right, title, and interest in a Ferrari F12 with VIN undetermined.” The Government now particularizes that description as follows: “jj. All right, title, and interest in a 2016 Ferrari F12 with VIN ZFF74UFA3G0212252.” The vehicle is within the custody and control of the Government following seizure.

DATED this 25th day of July, 2022.

Respectfully Submitted,

LORINDA I. LARYEA  
ACTING CHIEF  
U.S. DEPARTMENT OF JUSTICE  
CRIMINAL DIVISION, FRAUD SECTION

By: /s/ William E. Johnston  
WILLIAM E. JOHNSTON  
ASSISTANT CHIEF, FRAUD SECTION  
William.Johnston4@usdoj.gov  
United States Department of Justice  
Criminal Division, Fraud Section  
1400 New York Ave. NW

Washington, DC 20005  
Tel: (202) 514-0687  
TIAN HUANG  
TRIAL ATTORNEY  
Tian.Huang@usdoj.gov  
United States Department of Justice  
Criminal Division, Fraud Section  
1400 New York Ave. NW  
Washington, DC 20005  
Tel: (202) 598-2523

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2022, I electronically filed the foregoing with the Clerk of the Court of the United States District Court for the District of Nebraska by using the CM/ECF system.

/s/ Tian Huang  
TIAN HUANG